

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20021-CR-GAYLES

UNITED STATES OF AMERICA,

v.

ERICK NTEKEREZE PRINCE,
EMANUEL ASHTOR,

Defendants.

_____ /

JOINT MOTION FOR CONTINUANCE OF TRIAL

Defendants, **ERICK NTEKEREZE PRINCE** and **EMANUEL ASHTOR**, the United States of America (“Government”) by and through their respective counsel, and in accordance with *18 U.S.C. §3161(h)(7)* and *S.D. Fla. L.R. 7.6*, hereby file this Joint Motion for Continuance of the currently set trial date. As grounds in support of this request, the Parties state:

On January 21, 2025, the United States filed a Sealed Indictment against these Defendants and three other defendants.

On January 22, 2025, Defendant Emanuel Ashtor (“Defendant Ashtor”) was arrested and on January 23, 2025, Defendant Erick Ntekereze Prince (“Defendant Prince”) was arrested.

On January 22, 2025, an Order granting the United States’ Motion to Unseal the Indictment was granted. [DE 6]. The Indictment charges the Defendants with Conspiracy to Damage a Protected Computer in violation of 18 U.S.C. § 371 (Count 1); Conspiracy to Commit Wire Fraud and Mail Fraud in violation of 18 U.S.C. § 1349 (Count 2); Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h) (Count 3); and Conspiracy to Transfer False Identification Documents in violation of 18 U.S.C. §1028(a)(2) and (f). [DE 3].

On February 6, 2025, Defendants were arraigned in this matter. [DE 15, 18].

On February 20, 2025, the Government filed a Motion for Protective Order , which the Court granted on February 21, 2025. [DE 24, 27].

On February 21, 2025, the Court entered an Order setting trial for the two-week period commencing March 24, 2025, and calendar call is set for March 19, 2025.

The Government provided initial discovery on February 24, 2025. This discovery includes two zip files with numerous materials the Government has designated “Confidential” pursuant to the Court’s protective order. The Government has advised defense counsel that discovery is not yet complete and the Parties have scheduled a conference call on March 7, 2025, to discuss the additional discovery. At that time, the Parties will have a better idea of the amount of discovery still pending and when the Government expects to provide the Defendants with the additional discovery.

Accordingly, the Parties jointly request a 60-day continuance of trial.

This Motion is being filed in good faith, in the interests of judicial economy to afford Defendants effective assistance of counsel. The subject Motion is not being filed for purposes of undue delay.

WHEREFORE the Parties respectfully pray that this Honorable Court grant this Joint Motion for Continuance of Trial, enter an Order continuing this case for sixty (60) days, and for any other relief the Court deems proper and just under the circumstances.

QUINTERO BROCHE, P.A. <i>Attorney for Emanuel Ashtor</i> BY: <u>/s/ Frank Quintero, Jr.</u> FRANK QUINTERO, JR. Florida Bar No.: 399167 75 Valencia Ave., Suite 800 Coral Gables, Florida 33134 Tel.: 305-446-0303/Fax: 305-446-4503 E-mail: fquintero@quinterolaw.net eservice@quinterolaw.net	FEDERAL PUBLIC DEFENDER Hector Dopico <i>Attorney for Erick Ntekereze Prince</i> BY: <u>/s/Marisa Rayna Taney</u> Marisa Rayna Taney Assistant Federal Public Defender 150 W. Flagler Street, Suite 1700 Miami, Florida 33130 Tel: (305) 530-7000 Email: Marisa_Taney@fd.org
NATIONAL SECURITY DIVISION Sue Bai <i>Acting Supervisory Official</i> BY: <u>/s/ Gregory J. Nicosia, Jr.</u> GREGORY JON NICOSIA, JR. Court No. A5503319 Trial Attorney National Security Division 950 Pennsylvania Avenue, NW Washington, DC 20530 Tel: (202) 353-4273 Email: Gregory.Nicosia@usdoj.gov	UNITED STATES ATTORNEY'S OFFICE Hayden P. O'Byrne BY: <u>/s/ Sean Paul Cronin</u> Sean Paul Cronin Assistant United States Attorney Court No. A5500940 99 NE 4th Street Miami, FL 33132 Tel: 305-961-9194 Fax: 305-530-6168 Email: sean.p.cronin@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 3, 2025, a true and correct copy of the foregoing has been filed and served on all counsel of record via CMECF.

Respectfully submitted,

QUINTERO BROCHE, P.A.
Attorneys for Defendant Emanuel Ashtor
 75 Valencia Ave., Suite 800
 Coral Gables, Florida 33134
 Tel.: 305-446-0303
 Fax: 305-446-4503
 E-mail: eservice@quinterolaw.net
 fquintero@quinterolaw.net

BY: /s/ Frank Quintero, Jr.

FRANK QUINTERO, JR.
 Fla. Bar 399167